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**From:** Nesci, Kimberly [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=595346A8AF7F4753A47D24196F36ADE3-KIMBERLY A NESCI]  
**Sent:** 1/28/2021 1:30:16 PM  
**To:** Messina, Edward [Messina.Edward@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]  
**CC:** Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Nguyen, Thuy [Nguyen.Thuy@epa.gov]  
**Subject:** RE: PFAS Briefing for Michal tomorrow at 10:30am  
**Attachments:** PFAS Anvil Briefing1-11-21 (003).docx

Just saw this – for materials, we don't have something separate from the existing talking points & Region 1 paper yet. See attached and below.

I can pull these into one document in the next 30 min, if you'd like. I'll start doing this. Thuy, can you forward to the folks on this email the current data package transmittal to FDA?

Press statement: <https://www.epa.gov/newsreleases/epa-takes-action-investigate-pfas-contamination>  
Qs&As: <https://www.epa.gov/pesticides/pfas-packaging>

- OPP's Analytical Chemistry Lab (ACB) tested Clarke product (Anvil 10+10), and both fluorinated and un-fluorinated High Density Polyethylene (HDPE) containers for the presence of PFAS compounds.
- ACB is also in the process of developing a method for quantitative detection of PFAS in oily substances
- With regards to containers, ACB rinses containers with a solvent to determine the presence of PFAS. ACB has found the following:
  - Fluorinated containers provided by Clarke do contain PFAS
  - Unfluorinated containers provided by Clarke showed trace amounts of PFAS (near the limit of detection for the equipment used); ACB is investigating this, and it may be cross-contamination rather than the unfluorinated containers themselves, based on the small levels and the nature of the PFAS compounds.
- With regards to Anvil 10+10, ACB has found the following:
  - Clarke sample from the production line is cleaner (in terms of PFAS) than those that have been stored in containers (30-gallon drum and 2.5-gallon jug)
  - Sample of Clarke product directly from production line shows trace level of some PFAS and could be attributed to cross contamination
  - Samples of Clarke product stored in fluorinated containers (30-gallon drum and 2.5 gallon jug) show higher levels of PFAS (3-4x higher than production sample). However, the number of PFAS compounds found in the samples and their respective levels are ~100 fold less than the ones in the rinsates.
- Based on this, ACB hypothesizes that PFAS may be formed in the process of fluorinating High Density Polyethylene (HDPE) containers then leach into the Anvil 10+10 product. There is a plausible chemical pathway for this to occur. At this point, ACB does not have enough data to determine the leaching rate of PFAS from containers onto the products.
- OPP is aware that many companies use fluorinated HDPE containers to store and distribute pesticide products. OPP is working closely with OPPT and OECA. OECA is seeking additional information from the company Clarke uses to fluorinate their containers: Inhance Technologies and we expect to receive that information shortly.
- It is unclear at this point:
  - whether this may be happening to other products, pesticide products and otherwise.
  - whether this is specifically as a result of the process that Inhance uses or can happen with any HDPE fluorination process.
  - the conditions under which pfas is more or less likely to leach into pesticide products (solvents, temperature, time, etc...)
- We are discussing internally possible options for future testing to determine the above, as well as options to get state assistance with the testing.

- We are discussing internally the release of the data obtained to date.

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**From:** Messina, Edward <Messina.Edward@epa.gov>

**Sent:** Wednesday, January 27, 2021 6:11 PM

**To:** Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>

**Cc:** Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>

**Subject:** PFAS Briefing for Michal tomorrow at 10:30am

Can we send up materials in the morning? Friday is when the politicals are discussing this. That is why the timing. Can we show Michal the draft agency document too? Kimberly, I can introduce the topic and then kick it to you. Does that work?

Ed

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Ed Messina, Esq.

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